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Attorneys for Plaintiffs
Sara Ochoa and Kimberly Brown and
All Others Similarly Situated

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

SARA OCHOA and KIMBERLY BROWN,
on behalf of themselves and those similarly
situated,

Plaintiff.

V

ZEROO GRAVITY GAMES LLC, a
Delaware limited liability company,

Defendant.

Case No. 2:22-cv-05896-GHW-AS

PLAINTIFFS' RESPONSE TO ORDER FOR SUPPLEMENTAL FILING

Judge: Hon. George H. Wu

1 Plaintiffs Sara Ochoa and Kimberly Brown (collectively, “Plaintiffs”) provide
2 this supplemental brief in response to the Court’s September 19, 2025 Order
3 regarding Attorneys’ Fees (“Order”). Dkt. 169. The Order requests Class Counsel to
4 provide further information regarding the time spent prosecuting this action. Class
5 Counsel herein provides the additional details requested by the Court.

6 **Time Spent Reviewing Operation and Functionality of the ZG Mobile Games**

7 The Court first asks Plaintiffs to explain the amount of time spent on
8 reviewing the ads in the ZG Mobile Games. The Court notes that there are
9 approximately 150 discrete time entries for this task. In total, those time entries
10 amount to less than 75 hours over three years - approximately 5% of Class
11 Counsel’s total hours. While the description used was admittedly short – “reviewing
12 ads” – the specific steps performed within this description was far more involved.

13 Of these hours, approximately 40 hours were part of the counsel’s pre-filing
14 investigation. During this period, Class Counsel logged into Cash Tornado and
15 Jackpot Master Slots on a near daily basis spending approximately 6-15 minutes per
16 day per game to observe (1) the various sale offers to confirm that the stricken
17 reference price was not the prevailing offer during a period of 90 days (as required
18 by Cal. Bus. & Prof. Code §17501), and (2) the gaming mechanics, pricing and
19 economy of the games for different users on different devices over that time. The
20 Court suggests that these observations could have been made in a few hours to
21 determine certain patterns. However, the economy and mechanics of these games
22 are more nuanced and therefore required consistent monitoring over a period of
23 several months. Also, because the economy changes with game progression, some
24 degree of engagement with the games was necessary to advance different accounts
25 to higher levels.

26 Counsel was initially investigating two separate ZGG games (Cash Tornado
27 and Jackpot Master Slots) and then a third (Jackpot Friends). Counsel’s
28 investigation included monitoring the sale offers on different devices (i.e. OS and

1 Android) and with different accounts at different progression levels. This was
2 important, because the games deployed “dynamic pricing” where each user was
3 presented with different sale offers depending on their progression in the game,
4 engagement level and spending history. Thus, in order to evaluate whether the
5 reference prices in the ZG Mobile Games were not genuine and did not reflect the
6 prevailing price, Class Counsel thought it prudent to observe how the dynamic
7 pricing changed across devices and users of different progress levels. Still further,
8 on some days, multiple logins were made to observe the operation of the various
9 countdown presentations. These tasks made the investigation more time-consuming
10 and resulted in variability in the amount of time spent on a given day.

11 Further, counsel also investigated whether the games violated gambling laws.
12 In order to do so, Class Counsel played the slot machines casino games to the point
13 of exhausting the virtual coins (which contributed to variances in time on a given
14 day) to observe how long coins last in the games and the presentations and
15 mechanics when coins are depleted in different slot games. Counsel further
16 observed the various distribution of free coins in the games, which vary over time as
17 different milestones and challenges are presented. Counsel further investigated the
18 numerous mini-games (e.g. lottery and wheel of fortune games) to determine if they
19 violated other provisions of California gambling laws besides prohibitions against
20 slot machines.

21 Counsel acknowledges that this time spent was tedious and factual,
22 investigatory work. Coming out of the COVID crisis, between December 2021 -
23 August 2022, The Ryan Law Group only had a single attorney and two support staff
24 (who were not trained paralegals.) Counsel took this case on a contingency basis,
25 bearing the full risk of time and costs needed to prosecute this action. The claims
26 here presented novel and complex issues of law. For example, while false reference
27 pricing claims had been litigated in the retail context for some time, there was little,
28 if any, law on such claims in the context of mobile games. Given the nuances of the

1 games' economy in relation to complex legal theories and given that Class Counsel
2 was deciding whether to take these claims on a full contingency basis, counsel's
3 reasonable judgment at the time was that spending on average 15-20 minutes a day
4 to understand these games first-hand was a prudent investment of time.

5 Further, this time spent paid dividends in this action, because the sufficiency
6 of Class Counsel's investigation came under direct attack by Defendant in its Rule
7 11 motion. Defendant accused Mr. Ochoa and her counsel of "willfully fail[ing] to
8 conduct the basic investigation that would have quickly confirmed the falsity of her
9 allegations." Dkt. 19 at 2. These accusations and the threat of personal sanctions
10 against Plaintiff were designed to pressure Class Counsel to withdraw Plaintiff's
11 claims. At this same time, Defendant updated its terms of service to include
12 mandatory arbitration and class waiver provisions. Thus, Class Counsel had not
13 conducted a thorough investigation that allowed him to withstand Defendant's threat
14 of sanctions, class members would have been left with no recourse before the Court.

15 The remainder of the time was the result of Class Counsel continuing to
16 monitor and collect evidence from the games and to investigate an additional game
17 Defendant introduced during the litigation (Jackpot Friends). Defendant updates the
18 games on approximately monthly basis and Class Counsel was periodically
19 checking those updates to confirm whether there were any material changes that
20 would impact the class definition or claims. Class Counsel also spent time to test
21 changes to the games after the Settlement was entered.

22 For these reasons, Class Counsel respectfully submits that the time spent
23 investigating Defendant's games was reasonable and necessary. The Court
24 comments that this "factual, investigatory work is "non-legal and does not require
25 the skills and experience of an attorney." Even if, in hindsight, half or all of this
26 investigatory work would have been more efficient to delegate, it does not warrant
27 excluding these hours entirely, but at most, warrants applying a lower billing rate to
28

1 those hours (e.g. \$350 per hour for a paralegal), which would only result warrant a
2 1.25 - 2.5% reduction of the requested fees.

3 **Allocation with *Ballew* matter**

4 This action was filed more than a year before the *Ballew* matter and the work
5 performed on this action during that time has been attributed entirely to this action.
6 While some of that work became useful in the *Ballew* matter, resulting in greater
7 efficiencies, that time has been allocated entirely to this matter because it was
8 incurred before Class Counsel was representing any client with a claim against
9 Huuuge Inc. The primary work for which there was overlap between this action and
10 the *Ballew* matter that required allocation was with respect to the researching of
11 each state's gambling laws in connection with preliminary approval of the
12 settlements. This was a large undertaking that required several hours of work a day
13 review gambling statutes, regulations and case law for each state. On average, it
14 took 1-2 hours per state to identify and review the applicable gambling statutes,
15 which often encompassed multiple statutes directed to slot machines, casino games,
16 sweepstakes and lotteries. An additional 1-2 hours was spent per day reviewing case
17 law and any state agency opinions regarding these statutes. Class Counsel allocated
18 this work equally between this matter and the *Ballew* matter. Class Counsel's
19 remaining time was specific to each case.

20 **Time Spent Responding to Motions to Dismiss and Rule 11 Motions**

21 The Court asks Plaintiffs to explain why Class Counsel spent nearly 100
22 hours on their opposition to Defendant's Rule 11 motion; over 70 hours drafting and
23 revising their opposition to Defendant's motion to dismiss; over 40 hours drafting
24 and revising a motion to compel discovery and corresponding declaration; nearly 70
25 hours drafting and revising the motion for preliminary settlement approval. These
26 tasks totaled 280 hours, approximately 19% of the total time spent on this matter.

27 Class Counsel notes that the reasonableness of these hours should be
28 considered in the context of Mr. Ryan performing much the brief writing himself,

1 whereas such work at larger law firms is often times be performed by 2-3 senior
2 attorneys, resulting in the same or likely more total hours spent. Class Counsel's
3 time should not be found to be excessive simply because he performed this work by
4 himself. To the contrary, this likely resulted in more efficiency, as Class Counsel
5 did not spend the many hours typically seen for teleconferences and team meetings.

6 With respect to the opposition to Defendant's Rule 11 Motion, given the
7 importance and potentially devastating outcome of losing that motion, Class
8 Counsel spent the entirety of two weeks preparing that brief, supporting declarations
9 and supporting evidence. This work broke down approximately as follows:

- 10 • Strategy and Planning (10–15 hours)
 - 11 ○ Review of motion and supporting papers
 - 12 ○ Create an annotated outline of all issues raised
 - 13 ○ Create timeline of tasks
 - 14 ○ Perform risk assessment to firm and client if motion granted;
 - 15 ○ Discuss with client
 - 16 ○ Evaluate impact of potential outcomes and opportunities for settlement
- 17 • Comprehensive Legal Research (18–20 hours)
 - 18 ○ Substantive precedent (10–12 hours): Research binding appellate cases
19 and persuasive authorities regarding the objective reasonableness
20 standard for pleadings, limits on using Rule 11 as a substitute for
21 summary judgment or discovery disputes, potential procedural defects in
22 service and safe harbor timing, cases denying sanctions where similar
23 claims survived motions to dismiss.
 - 24 ○ Analogous fact patterns (6–7 hours): Pull cases involving similar claims
25 (e.g., consumer protection, reference pricing, TCPA, etc.), showing
26 courts held they were not sanctionable even when dismissed.
 - 27 ○ Secondary sources (2 hours): Review treatises, practice guides, and
28 recent law review commentary on Rule 11 misuse.

- 1 • Reviewing and testing veracity of declaration provided by Defendant;
2 compare declaration to internal finding (5-7 hours).
- 3 • Exhibit and declaration preparation (4 hours)
- 4 • Drafting first draft of opposition (35–40 hours)
- 5 • Editing and review (4 hours)
- 6 • Cite checking& Proofing (8–10 hours)
- 7 • Record Verification (2–3 hours)
- 8 • Formatting and local rule compliance (2–3 hours)
- 9 • Finalization & Filing Preparation (8–10 hours)

10 Counsel acknowledges that this is a significant amount of time and perhaps more
11 than would be spent in opposing a typical motion, but this was not a typical motion.
12 Given the potentially devastating impact that losing that motion would have had on
13 Plaintiff and her counsel, Class Counsel thought it necessary to invest significant
14 resources in responding.

15 With respect to the motions to dismiss, Plaintiffs were responding to two
16 motions to dismiss – one from Zeroo Gravity Games and one from its parent
17 company, AppLovin. Class Counsel respectfully submits that spending an average
18 of 35-40 hours in opposing each motion is reasonable. Further, Class Counsel
19 believes that spending approximately 70 hours on the papers for preliminary
20 approval of the class settlement is reasonable, as this involved a 38-page
21 memorandum, an expert declaration, counsel’s declaration, and declarations from
22 Plaintiffs.

23 Similarly, the motion to compel Class Counsel drafted was directed to nearly
24 every request for production and interrogatory Plaintiff served, because Defendant
25 was refusing to provide any such information other than data specific to Ms. Ochoa.
26 Thus, the motion to compel initially addressed requests and interrogatories, directed
27 to sales information, pricing strategies, the operation of sales in the games and class
28 contact information, totaling ten requests and interrogatories. While the motion

1 ultimately served was narrowed through additional meet and confer, the
2 approximately 40 hours spent in preparing Plaintiffs' portion of the L.R. Rule 37-1
3 joint stipulation is not unreasonable or excessive given the number of issues that
4 were in dispute.

5 Again, if the Court finds that some portion of these tasks should have been
6 performed by a less senior attorney, at most, this should result in the reduction of
7 the hourly rate for a portion of that work and does not warrant a significant
8 reduction or exclusion. For example, if the Court finds that half of that time should
9 have been delegated to an associate having an approximately 30% lower billing rate,
10 no more than 3% reduction from the Class Counsel's total fee request is warranted
11 ($30\% \times 50\% \times 19\%$).

12 **Block Billing**

13 The Court asked counsel to provide further details regarding time entries that
14 were "block billed." The Court did not identify which specific entries it considered
15 to be blocked billed, but counsel assumes the Court is referring to those entries that
16 include multiple tasks in the same day in a single entry. Based on counsel's review,
17 there are 64 such entries out of 1,405 entries. Counsel provides additional details
18 regarding those entries in the updated timesheet attached hereto as Exhibit A.

19 Counsel further respectfully submits that the presence of block billing in less
20 than 5% of the entries does not warrant a reduction in fees. *See Trulock v. Hotel*
21 *Victorville*, 92 F. App'x. 433, 434 (9th Cir. 2004) (rejecting the argument that
22 "reliance on block billing in awarding attorney fees deprives the party ordered to
23 pay those fees of property without due process by denying that party the opportunity
24 to test, explain, or refute the evidence"); *Roadrunner Transp. Servs., Inc. v.*
25 *Tarwater*, No. 10-cv-1534-AGM-(LGx), 2013 WL 12170492, at *2 (C.D. Cal. Dec.
26 9, 2013), *aff'd*, 642 F. App'x. 759 (9th Cir. 2016) ("Attorneys do not have to make
27 one billing entry per task for a court to see where time was spent. The Court is not
28 persuaded that reducing fees for purported block-billing is appropriate")

1 here.”); *Pierce v. Cnty. of Orange*, 905 F. Supp. 2d 1017, 1030 (C.D. Cal. 2012)
2 (finding that the challenged block-billed entries were “sufficiently detailed to give
3 the Court an accurate sense of the tasks performed during each billed period” and
4 reducing them by only 5% to account for the time inflation inherent in block-
5 billing).

6 **Overall Reasonableness of Fee Request**

7 Class Counsel spent 1,500 of total attorney time over the course of 45
8 months. Class Counsel respectfully submits that, overall, this is a reasonable amount
9 of time in view of the complexity of the case and the level of skill needed to achieve
10 this result. “[T]he Court need not track and chart the reasonableness of each
11 individual billing entry. Rather, the Court ‘may take into account [its] overall sense
12 of [the] suit, and may use estimates in calculating and allocating an attorney’s
13 time.’” *Athena Cosms., Inc. v. AMN Distribution Inc.*, No. 2:20-CV-05526-SVW-
14 SHK, 2025 WL 736570, at *4 (C.D. Cal. Jan. 29, 2025) (quoting *Fox v. Vice*, 563
15 U.S. 826, 838 (2011)). The hours spent by Class Counsel should be considered in
16 the context that Mr. Ryan performed nearly all of the work himself with only one
17 junior associate. While the Court noted that some of that work may have been
18 performed by a less senior attorney or paralegal, any inefficiency from that lack of
19 delegation is more than offset by the inefficiencies of having a larger team, such as
20 having multiple attorneys participate in calls, attend hearings and hold internal
21 meetings.

22 Indeed, the hours spent by Class Counsel here are less than half those that this
23 Court recently found to be reasonable and efficient in a similar case. *Khan v.*
24 *BooHoo.com USA, Inc.*, Case No. 2:20-cv-03332-GW (JEMx) (C.D.Cal.) involved
25 claims regarding fake sales with respect to an online retailer but did not involve
26 issues of illegal gambling. That case reached a settlement within a similar time as
27 this case (2 years from filing). Counsel in *Khan* collectively spent 3,659 hours with
28 2,731 hours of partner work billed at a rate of \$850. In approving the a loadstar

1 multiplier of 1.63 against counsel's \$2.76 million in fees, the Court noted that
2 "Counsel took up a case, on contingency, thereby sacrificing time that could have
3 been spent on other, less-risky, matters, and put a substantial amount of work into
4 the matter, saving the actions from dismissal...Though the case is now almost three
5 years old, they achieved this result before much of the expenses associated with
6 discovery and further merit proceedings would have occurred, and they did so all
7 while leanly-staffing the matter." *Id.*, Dkt. 199 at 11.

8 Further, the fee request is reasonable in view of the value of the settlement,
9 which Defendant does not dispute. The Court found that it could not "satisfactorily
10 establish a valuation of the relief afforded by the Settlement." Dkt. 164 at 19.
11 However, both parties and Plaintiffs' damages expert agrees that the in-game credits
12 are worth \$6.7 million and that the value of the injunctive relief is substantially
13 more than that. In *BooHoo*, the Court applied the full-face value of \$10 gift cards
14 (with no non-coupon cash equivalent option) in awarding the requested attorneys'
15 fees. The Court found that "Plaintiffs' counsel do not advocate for a percentage
16 recovery here, considering there is no overall lump of money...However, they do
17 compare what the *do* seek by way of noting what percentage figure it would amount
18 in relation to the total value of the settlement." *BooHoo.com USA, Inc.*, Case No.
19 2:20-cv-03332-GW (JEMx), Dkt. 199 at 11. Like the in-game credits here, the gift
20 cards in *BooHoo* were only usable to "purchase items from a limited universe" of
21 BooHoo's online stores and "only ha[d] value 'if a class member [was] willing to do
22 business with the defendant.'" Dkt. 164 at 17. BooHoo does not provide a wide
23 variety of everyday essentials, but rather is a specialty clothing retailer. The only
24 distinction is that Defendant here sells virtual items rather than physical ones, which
25 by itself does not reduce the value of the settlement. Even if the Court does not
26 believe there is sufficient evidence to precisely measure the value of the in-game
27 credits, the undisputed record here establishes that the fee request is reasonable in
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1 view of that overall benefit when both the in-game credits and injunctive relief are
2 considered.

3 Counsel therefore respectfully submits that the \$1.09 million in fees and 1.4
4 loadstar multiplier being requested are reasonable and fair. To the extent the Court
5 reduces the fee award, Class Counsel respectfully submits that the record does not
6 support a reduction of more than a 5-10% “haircut.” Counsel further respectfully
7 submits that the modest loadstar multiplier of 1.4 should be maintained in view of
8 the risk taken, time committed, complexity of the issues involving novel areas of
9 law, degree of skill needed to oppose Defendant’s sophisticated counsel, outcome
10 achieved and aggressive tactics and awards in similar cases. See *Kerr v. Screen
11 Extras Guild, Inc.*, 526 F.2d 67, 70 (9th Cir. 1975).

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13 Dated: September 24, 2025

Respectfully submitted,

14 THE RYAN LAW GROUP
15

16 By: /s/ Andrew T. Ryan
17 Andrew T. Ryan

18 *Attorney for Plaintiffs*
SARA OCHOA and KIMBERLY BROWN
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Exhibit A

Date	Description	Biller	Time
12/1/2026	Communicate with potential client	AR	0.2
	Review Cash Tornado and Jackpot Master Slots gameplay		
12/6/2021	and ads	AR	2.2
12/6/2021	Review terms of service and revisions	AR	1.2
12/7/2021	Research ZGG and revenues	AR	3.3
12/7/2021	Review gameplay and economy (ZGG)	AR	1.8
12/8/2021	Review ads in games	AR	0.4
12/9/2021	Review ads in games	AR	0.5
12/10/2021	Review ads in games	AR	0.4
12/11/2021	Review ads in games	AR	0.4
12/12/2021	Review ads in games	AR	0.5
12/13/2021	Review ads in games	AR	0.3
12/14/2021	Review ads in games	AR	0.4
12/15/2021	Review ads in games	AR	0.5
12/16/2021	Review ads in games	AR	0.3
12/17/2021	Review ads in games	AR	0.4
12/18/2021	Review ads in games	AR	0.4
12/19/2021	Review ads in games	AR	0.4
12/20/2021	Review ads in games	AR	0.2
12/21/2021	Review ads in games	AR	0.4
12/22/2021	Review ads in games	AR	0.3
12/22/2021	Review ZGG game reviews	AR	0.4
12/23/2021	Review ads in games	AR	0.2
12/28/2021	Research ZGG litigation history and corporate structure	AR	1.8
12/28/2021	Review AppLovin SEC filings	AR	7.7
12/29/2021	Review ads in games	AR	0.6
12/30/2021	Review ads in games	AR	0.4
1/2/2022	Review ads in games	AR	0.5
1/3/2022	Review ads in games	AR	0.3
1/4/2022	Review ads in games	AR	0.5
1/5/2022	Review ads in games	AR	0.4
1/6/2022	Review ads in games	AR	0.5
1/7/2022	Review ads in games	AR	0.2
1/8/2022	Review ads in games	AR	0.4
1/9/2022	Review ads in games	AR	0.3
1/10/2022	Review ads in games	AR	0.5
1/11/2022	Review ZGG game reviews	AR	0.6
	Login to games to view ads	AR	0.1
1/12/2022	Review ads in games	AR	0.3
1/13/2022	Review ads in games	AR	0.5
1/14/2022	Review ads in games	AR	0.4
1/15/2022	Review ads in games	AR	0.6
1/16/2022	Review ads in games	AR	0.3

1/17/2022 Review ads in games	AR	0.4
1/18/2022 Review ads in games	AR	0.5
1/19/2022 Review ads in games	AR	0.4
1/20/2022 Review ads in games	AR	0.4
1/21/2022 Review ads in games	AR	0.5
1/22/2022 Review online complaints re ZGG/games Login to games to view ads	AR	1.2 0.3
1/23/2022 Review ads in games	AR	0.4
1/24/2022 Review youtube videos re games Login to games to view ads	AR	0.8 0.2
1/25/2022 Review ads in games	AR	0.4
1/26/2022 Review ads in games	AR	0.5
1/27/2022 Review ads in games	AR	0.4
1/28/2022 Review ads in games	AR	0.4
1/29/2022 Review ads in games	AR	0.4
1/30/2022 Review ads in games	AR	0.5
1/31/2022 Review ads in games	AR	0.4
2/1/2022 Review ads in games	AR	0.3
2/2/2022 Review ads in games	AR	0.5
2/3/2022 Review ads in games	AR	0.5
2/4/2022 Review ads in games	AR	0.5
2/5/2022 Review ads in games	AR	0.2
2/6/2022 Review ads in games Review social media posts re games	AR	0.4 2.1
2/8/2022 Review ads in games	AR	0.4
2/9/2022 Review ads in games	AR	0.3
2/10/2022 Review ads in games	AR	0.5
2/11/2022 Review ads in games	AR	0.4
2/12/2022 Review ads in games	AR	0.5
2/13/2022 Review ads in games	AR	0.5
2/14/2022 Review ads in games	AR	0.4
2/15/2022 Review ads in games	AR	0.4
2/16/2022 Review ads in games	AR	0.4
2/17/2022 Review ads in games	AR	0.5
2/18/2022 Review ads in games	AR	0.4
2/19/2022 Review ads in games	AR	0.4
2/20/2022 Review ads in games	AR	0.4
2/21/2022 Review ads in games Research games reviews in Apple/Google	AR	0.4 1.6
2/23/2022 Review ads in games	AR	0.4
2/24/2022 Review ads in games	AR	0.4
2/25/2022 Review ads in games	AR	0.6
2/26/2022 Review ads in games	AR	0.4
2/27/2022 Review ads in games	AR	0.4

2/28/2022	Review ads in games	AR	0.4
3/1/2022	Review ads in games	AR	0.2
3/2/2022	Review ads in games	AR	0.4
3/3/2022	Review ads in games	AR	0.3
3/4/2022	Review ads in games	AR	0.2
3/5/2022	Review ads in games	AR	0.2
3/6/2022	Review ads in games	AR	0.2
3/7/2022	Review ads in games	AR	0.2
3/8/2022	Review ads in games	AR	0.2
	Research FTC regulations and case law regarding fake sales	AR	3.2
	Research CA law regarding fake sales	AR	3.6
3/11/2022	Research other state law regarding fake sales	AR	3.4
3/14/2022	Research class certification issues re false discounts	AR	4.2
3/15/2022	Research class settlements in fake sale cases	AR	4.7
3/16/2022	Research class settlements in fake sale cases	AR	3.5
3/21/2022	Research videogame and loot box case law	AR	3.4
3/22/2022	Research videogame and loot box case law	AR	2.7
3/23/2022	Research Kater and progeny/related settlements	AR	4.3
3/24/2022	Research damages models for false discount cases	AR	5.2
3/28/2022	Review game ads	AR	0.3
3/29/2022	Review game ads	AR	0.4
3/30/2022	Review game ads	AR	0.4
3/31/2022	Review game ads	AR	0.3
4/1/2022	Review game ads	AR	0.2
4/6/2022	Review game ads	AR	0.3
4/7/2022	Review game ads	AR	0.3
4/8/2022	Review game ads	AR	0.3
4/11/2022	Review game ads	AR	0.5
4/12/2022	Review game ads	AR	0.4
4/13/2022	Review game ads	AR	0.4
4/14/2022	Review game ads	AR	0.5
4/15/2022	Review game ads	AR	0.2
4/18/2022	Review game ads	AR	0.3
4/19/2022	Review game ads	AR	0.3
4/20/2022	Communicate with potential class rep	AR	1.6
	Register domain and prepare informational website for class members	AR	5.6
	Research law regarding personal jurisdiction for mobile apps	AR	5.6
4/21/2022	Review and revise website	AR	1
	Review game ads	AR	0.2
4/26/2022	Communicate with potential class rep	AR	1.2

	Research law regarding personal jurisdiction for mobile	
4/27/2022	apps	AR
	Review Google and Apple developer and publisher agreements	4.3
4/28/2022	Communicate with potential class rep	AR
	Review documents provided by client	0.3
	Research law regarding personal jurisdiction for mobile	
4/29/2022	apps	AR
4/30/2022	Communicate with potential class rep	AR
5/2/2022	Draft complaint	AR
	Research pleading elements	1.5
5/3/2022	Draft and revise complaint	AR
	Communicate with client	0.7
5/4/2022	Draft and revise complaint	AR
	Research applicability of CLRA to mobile apps	5.2
5/5/2022	Review/revise complaint	AR
	Prepare complaint for filing and file	0.5
5/5/2022	Research ZGG agent for service	AR
	Draft summons	0.5
	Draft cover sheet and LASC addendum	0.5
	Communicate with state court filing service	0.2
5/6/2022	Communicate with state court filing service	AR
5/9/2022	Communicate with client	AR
5/13/2022	Review conformed copies	AR
5/17/2022	Review ad dashboard	AR
5/20/2022	Communicate with potential class rep	AR
5/26/2022	Communicate with potential class rep	AR
5/29/2022	Communicate with potential class rep	AR
6/1/2022	Review game ads	AR
6/2/2022	Review ad dashboard	AR
6/3/2022	Review game ads	AR
6/6/2022	Review game ads	AR
6/8/2022	Communicate with potential class rep	AR
6/9/2022	Draft settlement letter to defendant	AR
6/10/2022	Review game ads	AR
6/14/2022	Review game ads	AR
6/15/2022	Communicate with potential class rep	AR
6/16/2022	Review class member intake	AR
6/20/2022	Review game ads	AR
6/21/2022	Draft amended complaint	AR
6/22/2022	Communicate with potential class rep	AR
6/23/2022	Review class member intake	AR
6/24/2022	Review game ads	AR
		2

Research law regarding pleading national class vs state		
6/27/2022 class	AR	6.3
6/28/2022 Review game ads	AR	0.4
6/29/2022 Communicate with client	AR	0.7
6/30/2022 Draft amended complaint	AR	6.7
7/1/2022 Review game ads	AR	0.2
7/2/2022 Review game ads	AR	0.2
7/4/2022 Review game ads	AR	0.2
7/6/2022 Review game ads	AR	0.2
7/10/2022 Review game ads	AR	0.2
7/13/2022 Review game ads	AR	0.2
7/16/2022 Review game ads	AR	0.2
7/17/2022 Review game ads	AR	0.2
Research changes to terms of service and other terms on ZGG website	AR	1.4
7/18/2022 Draft and revise amended complaint	AR	4.5
Prepare amended complaint for filing	AR	0.5
Communicate with filing service	AR	0.5
8/1/2022 Review game ads	AR	0.2
8/8/2022 Review game ads	AR	0.2
8/11/2022 Review game ads	AR	0.3
8/15/2022 Review game ads	AR	0.2
8/19/2022 Draft CMC statement		1
8/20/2022 Communicate with opposing counsel	AR	0.5
Review stipulation to extend time to answer	AR	0.4
8/22/2022 Review ZGG removal papers	AR	1
Communicate with opposing counsel	AR	0.5
8/23/2022 Revise stipulation re deadlines	AR	0.3
8/26/2022 Research law regarding remand	AR	1.3
8/27/2022 Research law regarding remand	AR	2.6
8/28/2022 Review game ads	AR	0.4
8/29/2022 Review game ads	AR	0.4
8/30/2022 Review order setting scheduling conference	AR	0.8
8/31/2022 Review game ads	AR	0.4
9/7/2022 Review game ads	AR	0.2
9/14/2022 Review game ads	AR	0.2
9/19/2022 Prepare/attend Rule 26(f) meeting of counsel	AR	0.9
Review game ads	AR	0.2
9/20/2022 Review proposed stipulation re case schedule	AR	0.3
Review game ads	AR	0.2
9/21/2022 Revise stipulation re deadlines	AR	0.2
Review game ads	AR	0.2
9/22/2022 Review order on stipulation	AR	0.1
Review game ads	AR	0.2

9/26/2022	Review game ads Research AppLovin involvement/control over ZGG and	AR	0.2
9/27/2022	ZGG acquisition Review game ads Research AppLovin involvement/control over ZGG and	AR	3.2
9/28/2022	ZGG acquisition	AR	3.9
9/29/2022	Review game ads	AR	0.2
10/4/2022	Review game ads	AR	0.4
10/11/2022	Draft second amended complaint	AR	4.6
10/12/2022	Draft second amended complaint	AR	4.6
10/13/2022	Review and revise second amended complaint Prepare SAC for filing Review Rule 11 motion, case law and related	JK	4.9
10/28/2022	correspondence Draft letter in response to Rule 11 motion/letter Review game ads	AR	3.3
10/29/2022	Review game ads	AR	0.2
10/30/2022	Review game ads	AR	0.2
10/31/2022	Revise letter in response to Rule 11 motion/letter	AR	0.5
11/1/2022	Review game ads	AR	0.2
11/3/2022	Review game ads	AR	0.2
11/4/2022	Review letter from opposing counsel re R11	AR	0.8
11/6/2022	Review game ads	AR	0.2
11/8/2022	Review game ads and updated terms of service Research law regarding updating terms of service during	AR	1.8
11/9/2022	class action Research law regarding updating terms of service during	AR	6.8
11/10/2022	class action	AR	5.5
11/11/2022	Research law re enforceability of updated TOS	AR	6.5
11/12/2022	Review game ads	AR	0.2
11/14/2022	Draft response to letter re R11 Begin drafting R11 opposition	AR	7.5 1.1
11/15/2022	Draft TRO regarding updated TOS	AR	7.8
11/16/2022	Draft TRO regarding updated TOS	AR	8.2
11/17/2022	Draft TRO regarding updated TOS	AR	6.8
11/18/2022	Review game ads	AR	0.2
11/19/2022	Review game ads	AR	0.2
11/20/2022	Review game ads	AR	0.2
11/21/2022	Review game ads	AR	0.2
11/22/2022	Review Rule 11 motion and motions to dismiss Review cases cited in motion Research and shepardize cases cited in defendants'	AR	3.5 4
11/23/2022	motions Draft letter re updated TOS	AR	8.5 3.4

11/24/2022 Review game ads	AR	0.2
11/28/2022 Research case law regarding Rule 11	AR	7.8
Research case law regarding pleading standards and sufficiency of pleadings		
11/29/2022 sufficiency of pleadings	AR	8.2
11/30/2022 Research law regarding allegations against parent corp	AR	8.1
12/1/2022 Draft opposition to ZGG MTD	AR	12.2
12/2/2022 Draft opposition to ZGG MTD	AR	11.8
12/3/2022 Draft opposition to AppLovin MTD	AR	11.2
12/4/2022 Revise opposition briefs	AR	10.2
12/5/2022 Revise opposition briefs	AR	6
Draft declaration	AR	4.5
Collect exhibits and prepare for filing	AR	1
Review and revise oppositions to MTDs	JK	2.7
Cite check brief	JK	6.5
Create TOC and TOA and ensure compliance with local rules	JK	3.5
12/6/2022 Draft/revise opposition to R11 motion	AR	7
Draft stipulation re enforcement of updated TOS	AR	3.1
12/7/2022 Draft/revise opposition to R11 motion	AR	8.6
12/8/2022 Draft/revise opposition to R11 motion	AR	9.5
12/9/2022 Draft/revise opposition to R11 motion	AR	8.3
Communicate with client	AR	1.5
12/11/2022 Draft/revise opposition to R11 motion	AR	6.5
12/12/2022 Draft/revise opposition to R11 motion	AR	7.8
12/13/2022 Draft/revise opposition to R11 motion	AR	8.1
12/14/2022 Draft/revise opposition to R11 motion	AR	7.7
12/15/2022 Draft/revise opposition to R11 motion	AR	7.9
12/16/2022 Draft/revise opposition to R11 motion	AR	8.3
12/18/2022 Draft/revise opposition to R11 motion	AR	8.4
12/19/2022 Draft/revise opposition to R11 motion	AR	7.6
12/20/2022 Draft/revise opposition to R11 motion	AR	8.5
12/21/2022 Draft declaration and prepare exhibits re R11 motion	AR	10.5
12/22/2022 Revise opposition to R11 motion	AR	7.3
Draft declaration and prepare exhibits	AR	4.5
Prepare for filing	AR	0.8
Review and revise opposition to R11 motion	JK	4.3
Cite check brief	JK	5.8
Prepare TOC and TOC	JK	2.7
Review reply briefs in support of motions to dismiss and cited cases		
1/2/2023 cited cases	AR	8.3
1/3/2023 Review game ads	AR	0.3
1/5/2023 Review game ads	AR	0.4
1/6/2023 Review reply brief re R11 motion	AR	5.3
1/7/2023 Communicate with client	AR	0.5

1/8/2023 Review game ads	AR	0.4
1/9/2023 Review/analyze potential costs of sanctions/R11	AR	5.8
1/10/2023 Review stipulation to continue	AR	0.5
1/11/2023 Update ads re class reps	AR	3.7
Research cases imposing R11 sanctions and potential		
1/12/2023 exposure	AR	8.8
Research privilege and work product waiver issues re pre-		
1/13/2023 filing investigation	AR	8.7
1/14/2023 Review game ads	AR	0.4
1/15/2023 Review class member intake	AR	0.4
1/16/2023 Review sanctions/R11 issue with insurance/counsel	AR	3.5
1/17/2023 Communicate with potential class reps	AR	0.5
1/18/2023 Review game ads	AR	0.4
1/19/2023 Research privilege issues re pre-filing investigation	AR	3.9
1/20/2023 Review game ads	AR	0.4
1/22/2023 Review ads	AR	0.4
1/23/2023 Review game ads	AR	0.4
1/25/2023 Review game ads	AR	0.4
1/26/2023 Review ads dashboard	AR	0.3
1/27/2023 Communicate with potential class reps	AR	0.7
Collect notes re pre-filing investigation in preparation for		
1/28/2023 hearing	AR	7.4
Review briefs and case law to prepare for hearing on		
1/29/2023 MTDs and R11 motion	AR	7.8
Review briefs and case law to prepare for hearing on		
1/30/2023 MTDs and R11 motion	AR	3
Draft potential demonstratives for hearing illustrating first		
purchase offer operation	AR	5.4
Revise and draft potential demonstratives for hearing		
illustrating operation of super sale offer expiration and		
1/31/2023 restarting	AR	6
Draft argument notes	AR	2.5
2/1/2023 Review tentative re MTDs and R11 Motion	AR	2.5
2/2/2023 Attend hearing	AR	4.5
2/6/2023 Communicate with potential class reps	AR	0.8
2/7/2023 Research Arkansas gambling law	AR	8.2
2/8/2023 Research Arkansas consumer protection law	AR	7.8
2/9/2023 Research Arkansas consumer protection law	AR	5
Draft amended complaint	AR	3.3
2/10/2023 Research Arkansas consumer protection law	AR	6.2
Draft amended complaint	AR	2.2
2/13/2023 Communicate with potential class reps	AR	0.6
2/15/2023 Draft amended complaint	AR	8.6
2/16/2023 Draft amended complaint	AR	8.5

2/17/2023 Draft and revise amended complaint	AR	8.2
2/24/2023 Communicate/review re stipulation re briefing schedule	AR	0.5
2/27/2023 Review order re stipulation	AR	0.2
3/17/2023 Review MTD 3AC	AR	3.3
3/20/2023 Review MTD 3AC	AR	3.1
3/21/2023 Review cases cited in MTD	AR	5.3
3/22/2023 Research case law in response to MTD	AR	7.5
3/23/2023 Research case law in response to MTD	AR	7.6
3/24/2023 Research case law in response to MTD	AR	7.3
3/27/2023 Draft opposition to MTD 3AC	AR	6.4
3/28/2023 Draft opposition to MTD 3AC	AR	7.2
3/29/2023 Draft opposition to MTD 3AC	AR	8.1
3/30/2023 Draft opposition to MTD 3AC	AR	6.6
3/31/2023 Draft opposition to MTD 3AC	AR	6.5
4/3/2023 Revise opposition to MTD 3AC	AR	8.3
4/4/2023 Revise opposition to MTD 3AC	AR	9.4
4/5/2023 Revise opposition to MTD 3AC	AR	4.3
Cite check brief	AR	5.5
4/6/2023 Revise opposition to MTD 3AC	AR	6.4
Insert TOC and TOA	AR	2.6
Prepare brief for filing and file	AR	1.1
5/5/2023 Review reply re MTD and keycite cases cited	AR	3.6
5/15/2023 Review/revise 26(f) report	AR	1.8
Review docket	AR	0.3
5/16/2023 Review/file 26(f) report	AR	1.5
Review briefs and read key cases in preparation for		
5/17/2023 hearing	AR	4
Review tentative ruling and draft notes on key points	AR	2.5
5/18/2023 Attend hearing	AR	4.7
5/19/2023 Research/draft supplemental brief re MTD	AR	8.9
5/22/2023 Draft/revise supplemental brief re MTD	AR	6.6
5/23/2023 Review D's supplemental brief re MTD	AR	2.1
5/24/2023 Attend hearing	AR	1.5
5/25/2023 Draft first set of RFPs and Interrogatories	AR	2.1
Draft interrogatories		1.8
Draft RFAs		2.8
6/5/2023 Draft amended complaint	AR	7.5
6/6/2023 Revise amended complaint	AR	7.5
Prepare amended complaint for filing and file	AR	1
Review amended complaint	JK	3.5
6/14/2023 Draft opposition to ex parte application	AR	3
Review/revise ex parte opposition	JK	3.4
6/28/2023 Review discovery responses	AR	2.1

Draft letter regarding deficiencies in discovery responses	AR	3.5
7/7/2023 Review D's MTD 4AC	AR	4.5
Meet and confer re discovery	AR	0.7
7/8/2023 Review cases cited in MTD	AR	5.1
7/10/2023 Draft/revise opposition to MTD	AR	6.9
Communicate with opposing counsel re discovery	AR	1.6
7/11/2023 Draft/revise opposition to MTD	AR	8.8
7/12/2023 Draft motion to compel discovery responses	AR	8.2
7/13/2023 Draft motion to compel discovery responses	AR	7.9
Communicate with opposing counsel re PO	AR	0.5
7/14/2023 Review/revise stipulation to continue hearing date	AR	0.5
Draft/revise opposition to MTD	AR	8
Research case law regarding discovery of class contact		
7/16/2023 info	AR	4.9
7/17/2023 Revise opposition to MTD	JK	9.4
Meet and confer re discovery	AR	1
Review and revise protective order	AR	2.5
7/18/2023 Draft email to opposing counsel re discovery	AR	1.5
7/24/2023 Communicate with client	AR	0.5
7/25/2023 Prepare outline of questions for depo prep	AR	8.5
7/27/2023 Draft deposition notices	AR	2.5
Depo prep	AR	4.5
7/28/2023 Attend deposition of S. Ochoa	AR	6.2
7/31/2023 Revise motion to compel discovery	AR	8.4
8/2/2023 Revise motion to compel discovery	AR	8.7
8/3/2023 Draft email to opposing counsel re discovery	AR	1.6
Review letter from opposing counsel	AR	0.8
Review sales data produced by D	AR	0.8
Communicate with opposing counsel	AR	0.3
8/4/2023 Revise motion to compel discovery	AR	3.4
Draft declaration and prepare exhibits re MTC	AR	4
8/5/2023 Review letter from opposing counsel	AR	0.2
8/7/2023 Draft letter to opposing counsel re CLRA notice	AR	1.7
Review letter from opposing counsel	AR	0.8
8/8/2023 Draft letter to opposing counsel re CLRA notice	AR	1.6
Draft letter re amendment of pleadings	AR	1.2
Review deposition transcript	AR	8.5
8/9/2023 Review discovery requests from Defendant	AR	3.6
8/10/2023 Review stipulation to stay	AR	1.2
8/13/2023 Research potential mediators proposed by Defendant	AR	2.1
Communicate with other plaintiffs counsel regarding experienced mediators with relevant experience	AR	3.4
8/25/2023 Communicate with mediator	AR	0.5

8/30/2023 Communicate with mediator	AR	0.5
9/26/2023 Communicate with mediator	AR	0.5
10/2/2023 Draft mediation brief	AR	4.9
10/3/2023 Revise mediation brief	AR	6.6
10/5/2023 Call with mediator	AR	1
10/9/2023 Prepare for mediation	AR	3.2
Communicate with client	AR	0.5
10/10/2023 Attend mediation	AR	8.5
11/3/2023 Review joint stipulation		0.3
11/13/2023 Draft mediation brief	AR	4.1
11/14/2023 Attend mediation	AR	4.2
12/7/2023 Review and revise settlement agreement	AR	3.9
12/8/2023 Review and revise settlement agreement	AR	3.9
1/2/2024 Review settlement agreement	AR	4
1/11/2024 Review status report	AR	0.5
2/14/2024 Communicate with clients	AR	1.7
Communicate with clients	AR	1.8
Collect client signatures	AR	0.7
3/4/2024 Draft motion for preliminary approval of class settlement	AR	8
3/5/2024 Draft motion for preliminary approval of class settlement	AR	8.1
3/6/2024 Draft motion for preliminary approval of class settlement	AR	8.4
3/7/2024 Draft motion for preliminary approval of class settlement	AR	8
3/12/2024 Review status report	AR	0.1
3/27/2024 Communicate with damages expert	AR	1
Draft/revise motion for preliminary approval and		
4/22/2024 supporting docs	AR	7.1
Draft/revise motion for preliminary approval and		
4/23/2024 supporting docs	AR	7.6
Draft/revise motion for preliminary approval and		
4/24/2024 supporting docs	AR	7.4
4/25/2024 Draft stipulation to exceed page limit		0.9
4/26/2024 Revise motion for preliminary approval	AR	5
Revise declaration in support of motion for preliminary		
approval	AR	1.4
Collect supporting declaration	AR	1.2
Prepare documents for filing and file	AR	1.5
Review case law re preliminary approval in preparation for		
5/27/2024 hearing	AR	4.7
Review preliminary approval papers in preparation for		
5/28/2024 hearing	AR	5.3

Review tentative re preliminary approval and draft notes		
5/29/2024 in response in preparation for hearing	AR	4
5/30/2024 Attend hearing re preliminary approval	AR	4.5
6/1/2024 Research Alabama gambling laws	AR	2
6/2/2024 Research Alaska gambling laws	AR	1.7
6/3/2024 Research Arizona gambling laws	AR	2.1
6/4/2024 Research Colorado gambling laws	AR	1.8
6/5/2024 Research Connecticut gambling laws	AR	1.9
6/6/2024 Research Delaware gambling laws	AR	1.4
6/7/2024 Research Florida gambling laws	AR	2.5
6/10/2024 Research Idaho gambling laws	AR	1.8
6/11/2024 Research Indiana gambling laws	AR	1.6
6/12/2024 Research Iowa gambling laws	AR	1.7
6/13/2024 Research Kansas gambling laws	AR	1.6
6/14/2024 Research Kentucky gambling laws	AR	2.4
6/17/2024 Research Maryland gambling laws	AR	2.1
6/18/2024 Research Massachusetts gambling laws	AR	2.3
6/19/2024 Research Michigan gambling laws	AR	2.1
6/20/2024 Research Minnesota gambling laws	AR	2.2
6/21/2024 Research Mississippi gambling laws	AR	2.1
6/24/2024 Research Nebraska gambling laws	AR	2
6/25/2024 Research Nevada gambling laws	AR	2.1
6/26/2024 Research New Hampshire gambling laws	AR	1.8
6/27/2024 Research New Jersey gambling laws	AR	2.2
6/28/2024 Research New Mexico gambling laws	AR	1.9
7/1/2024 Research N Dakota gambling laws	AR	2
7/2/2024 Research Ohio gambling laws	AR	2
7/3/2024 Research Oklahoma gambling laws	AR	2
7/8/2024 Research South Dakota gambling laws	AR	1.4
7/9/2024 Research Tennessee gambling laws	AR	1.8
7/10/2024 Research Texas gambling laws	AR	1.4
7/11/2024 Research Utah gambling laws	AR	1.6
7/12/2024 Research Vermont gambling laws	AR	1.7
7/13/2024 Research Pennsylvania gambling laws	AR	1.6
7/14/2024 Research Rhode Islang gambling laws	AR	1.7
7/15/2024 Research Wisconsin gambling laws	AR	1.9
7/16/2024 Research Wyonming gambling laws	AR	2
7/18/2024 Research Georgia gambling laws	AR	2
7/19/2024 Research Hawaii gambling laws	AR	1.3
7/22/2024 Research Missouri gambling laws	AR	1.5
7/23/2024 Research Montana gambling laws	AR	2.5
7/24/2024 Research New York gambling laws	AR	1.7
7/25/2024 Research North Carolina gambling laws	AR	2
7/26/2024 Research Oregon gambling laws	AR	2.3

7/27/2024 Research Louisiana gambling laws	AR	2
7/28/2024 Research Main gambling laws	AR	1.5
7/29/2024 Research South Carolina gambling laws	AR	1.8
7/30/2024 Research Virginia gambling laws	AR	2
7/31/2024 Research West Virginia gambling laws	AR	1.6
8/2/2024 Review supplemental brief by ZGG	AR	2.5
8/5/2024 Draft response to supplemental brief	AR	8.3
8/7/2024 Draft response to supplemental brief	AR	8.2
8/8/2024 Draft/review response to supplemental brief	AR	8.6
8/19/2024 Review joint stipulation to continue hearing	AR	0.5
8/21/2024 Review order continuing hearing	AR	0.1
Review preliminary approval filings and settlement in preparation for hearing		
9/14/2024 preparation for hearing	AR	2.2
Review tentative and prepare notes	AR	1.4
9/16/2024 Attend hearing re preliminary approval	AR	4.8
10/1/2024 Review/test changes made to ZGG games	AR	0.8
10/2/2024 Review/test changes made to ZGG games	AR	0.8
10/3/2024 Review/test changes made to ZGG games	AR	0.8
10/4/2024 Review/test changes made to ZGG games	AR	0.8
10/5/2024 Review/test changes made to ZGG games	AR	0.8
10/6/2024 Review/test changes made to ZGG games	AR	0.9
10/7/2024 Review/test changes made to ZGG games	AR	0.8
10/8/2024 Review/test changes made to ZGG games	AR	1.2
10/9/2024 Review/test changes made to ZGG games	AR	0.8
10/10/2024 Review/test changes made to ZGG games	AR	1.1
10/11/2024 Review/test changes made to ZGG games	AR	0.8
10/12/2024 Review/test changes made to ZGG games	AR	0.9
10/13/2024 Review/test changes made to ZGG games	AR	0.8
10/14/2024 Review/test changes made to ZGG games	AR	0.8
10/15/2024 Review/test changes made to ZGG games	AR	0.9
10/16/2024 Review/test changes made to ZGG games	AR	0.8
10/17/2024 Review/test changes made to ZGG games	AR	0.9
Review tutorial submission and draft email to opposing counsel re tutorial		
10/18/2024 Review preliminary approval filings and court's prior tentative in preparation for hearing	AR	4.4
Review court's tentative and prepare notes	AR	2.6
10/30/2024 Attend hearing re preliminary approval	AR	1.5
11/1/2024 Review preliminary approval order	AR	4.5
11/12/2024 Draft subpoenas to Apple and Google	AR	0.9
Communicate with vendor for service of subpoenas	AR	3.8
11/19/2024 Review/revise joint status report	AR	0.7
Review/revise renewed motion for preliminary approval and supporting docs	AR	0.4
12/16/2024 and supporting docs	AR	9.2

Review/revise renewed motion for preliminary approval		
12/17/2024 and supporting docs	AR	9.4
12/18/2024 Review/revise renewed motion for preliminary approval	AR	3.7
Communicate with opposing counsel	AR	0.5
Review prior correspondence regarding revenue disclosures	AR	6.4
Draft ex parte application re vacating preliminary approval		
12/19/2024 deadlines	AR	11.9
Communicate with opposing counsel re ex parte	AR	0.5
12/20/2024 Review response to ex parte application	AR	3.6
Draft notes in preparation for hearing	AR	1.5
12/26/2024 Review court order re ex parte	AR	0.7
1/13/2025 Review/revise status report	AR	0.5
1/15/2025 Prepare for status conference/hearing	AR	2.3
1/16/2025 Attend status conference	AR	3.2
Communicate with opposing counsel re		
1/17/2025 mediation/revenue data	AR	0.1
Communicate with opposing counsel re		
1/20/2025 mediation/revenue data	AR	0.3
Communicate with opposing counsel re		
1/21/2025 mediation/revenue data	AR	0.3
Communicate with opposing counsel re		
1/22/2025 mediation/revenue data	AR	0.3
Communicate with opposing counsel re		
1/23/2025 mediation/revenue data	AR	0.2
Communicate with opposing counsel re		
1/24/2025 mediation/revenue data	AR	0.2
2/16/2025 Draft mediation brief	AR	4.7
2/17/2025 Draft mediation brief	AR	4.5
2/26/2025 Attend mediation	AR	7.8
2/28/2025 Review/revise stipulation to vacate status conference	AR	0.3
3/6/2025 Review and revise settlement agreement	AR	3.8
3/7/2025 Review and revise settlement agreement	AR	6.7
4/1/2025 Draft/revise renewed motion for preliminary approval	AR	6.5
4/2/2025 Draft/revise renewed motion for preliminary approval	AR	6.2
4/3/2025 Draft/revise renewed motion for preliminary approval	AR	7.8
4/7/2025 Draft redline of amended settlement agreement	AR	1.4
Review preliminary approval filings in preparation for		
4/16/2025 hearing	AR	1.9
Review tentative re preliminary approval	AR	0.8
4/17/2025 Attend hearing re preliminary approval	AR	4.2
4/21/2025 Draft proposed order granting preliminary approval	AR	2.4
4/24/2025 Emails with administrator re class notices	AR	0.8
5/8/2025 Emails with administrator re class notices	AR	0.4

5/16/2025 Emails with administrator re class notices	AR	0.3
5/17/2025 Review in-game notices	AR	0.8
Review class settlement website	AR	1
Review publication notices	AR	0.5
5/29/2025 Emails with administrator re class notices	AR	0.3
6/3/2025 Emails with administrator re class notices	AR	0.3
6/4/2025 Emails with administrator re class notices	AR	0.3
6/5/2025 Emails with administrator re class notices	AR	0.3
6/6/2025 Emails with administrator re class notices	AR	0.3
7/23/2025 Emails with administrator re class notices	AR	0.5
7/30/2025 Draft motion for final approval	AR	6.3
7/31/2025 Draft motion for final approval	AR	6.2
8/4/2025 Draft motion for final approval	AR	6.4
8/5/2025 Draft motion for final approval	AR	7.3
8/18/2025 Draft motion for final approval	AR	8.4
8/19/2025 Draft stipulation to exceed page limit	AR	0.5
8/22/2025 Revise motion for final approval	AR	5.4
Draft declaration and collect exhibits	AR	3.5
8/26/2025 Review motion to file amicus brief	AR	1.2
9/2/2025 Draft response to amicus brief	AR	4.8
9/3/2025 Draft response to amicus brief	AR	3.2
9/5/2025 Review response to amicus brief filed by ZGG	AR	1.6
9/11/2025 Review response to motion for attorneys fees	AR	0.8
9/12/2025 Review response by WA AG	AR	1.1
9/15/2025 Draft reply re attorneys fees motion	AR	1.7
9/16/2025 Review supplemental declaration of administrator	AR	0.8
Review tentative re final approval	AR	0.9
9/18/2025 Attend final approval hearing	AR	3.9
9/18/2025 Prepare proposed order on final approval	AR	0.5
9/19/2025 Draft response re Court's question on proposed order	AR	0.7
9/19/2025 Communicate with opposing counsel re draft response	AR	0.3
9/19/2025 Draft supplemental brief re attorneys' fees	AR	3.5
9/23/2025 Draft supplemental brief re attorneys' fees	AR	2.7
 Total (AR)		1456 \$ 1,074,159.00
Total (JK)		47.2 \$ 23,600.00